

EXHIBIT B

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES, LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

ESTATE OF ARMAND L. GREENHALL,
PENG YAN, as Personal Representative of the
Estate of Armand L. Greenhall, and DEIDRE
SWEENEY, as Personal Representative of the
Estate of Armand L. Greenhall,

Defendants.

Adv. Pro. No. 10-05048 (SMB)

**[PROPOSED]
ORDER PURSUANT TO RULES 15 AND 21 OF THE FEDERAL
RULES OF CIVIL PROCEDURE, AS INCORPORATED BY RULES
7015 AND 7021 OF THE FEDERAL RULES OF BANKRUPTCY
PROCEDURE, GRANTING THE TRUSTEE LEAVE TO FILE A
SECOND AMENDED COMPLAINT AND FOR RELATED RELIEF**

This cause having come before the Court on March 28, 2018 on the motion (“Motion”) of
Irving H. Picard (“Trustee”), as trustee for the liquidation of the business of Bernard L. Madoff

Investment Securities, LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.*, and Bernard L. Madoff, by and through his counsel, Baker & Hostetler LLP, seeking entry of an order, pursuant to Rules 15 and 21 of the Federal Rules of Civil Procedure, as incorporated in this proceeding by Rules 7015 and 7021 of the Federal Rules of Bankruptcy Procedure, granting the Trustee's request for leave to file a Second Amended Complaint and for Related Relief; and the Court having considered the Memorandum of Law in Support of the Trustee's Motion for Entry of an Order Pursuant to Rules 15 and 21 of the Federal Rules of Civil Procedure, as Incorporated by Rules 7015 and 7021 of the Federal Rules of Bankruptcy Procedure, Granting the Trustee Leave to File a Second Amended Complaint and for Related Relief; and any objections thereto; and due notice of the Motion having been given, and it appearing that no other or further notice need be given; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and upon the proceedings before the Court and after due deliberation, it is hereby

ORDERED THAT:

1. The Motion is GRANTED.
2. The Trustee is granted leave to file his Second Amended Complaint.
3. The caption for this adversary proceeding is amended and shall appear as indicated in Exhibit 1 to this order.

Dated: _____, 201____
New York, New York

HONORABLE STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE

Exhibit 1

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

ESTATE OF ARMAND L. GREENHALL; PENG
YAN, individually and as Executor of the Estate of
Armand L. Greenhall; and DEIDRE SWEENEY, as
Executor of the Estate of Armand L. Greenhall,

Defendants.

No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-05048 (SMB)